UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, et al., Plaintiffs v. AMERICAN FOAM CORPORATION, et al., Defendants	C.A. No. 03-335L

ANSWER OF DEFENDANT JACK RUSSELL TOURING, INC. TO PLAINTIFFS' NOTICE OF ADOPTION OF FIRST AMENDED MASTER COMPLAINT AND PRO FORMA COMPLAINT

INTRODUCTION

On or about January 6, 2005, the Plaintiffs in this action (excluding Michelle Spence), George Guindon, *et al.*, (the "Guindon Plaintiffs") filed a Notice of Adoption and Pro Forma Complaint, adopting the First Amended Master Complaint filed in Albert L. Gray, Administrator, et al. v. Jeffrey Derderian, et al., C.A. No. 04-312L (the "Gray Case") in its entirety. The Guindon Plaintiffs have also adopted the additional allegations and claims set forth in Henault, et al. v. American Foam Corp., et al., C.A. No. 03-483L (the "Henault Case") in its entirety.

On January 7, 2005, Defendant Jack Russell Touring, Inc. ("JRT") filed its Answer to the First Amended Master Complaint in the Gray Case, and hereby adopts and incorporates said Answer in its entirety in response to the Guindon Plaintiffs' Adoption of the First Amended Master Complaint in the Gray Case, including the Affirmative Defenses and Jury Demand. On February 4, 2005, JRT filed its Answer to the additional allegations and claims filed in the

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Henault Case and hereby adopts and incorporates said Answer in its entirety in response to the Guindon Plaintiffs' Adoption of the additional allegations and claims of the Henault Case.

PARTIES

Plaintiffs have also asserted additional allegations identified only as Paragraphs "(260)" through "(280)" in Plaintiffs' Pro Forma Complaint. JRT responds to these supplemental allegations as follows:

260. - 280. JRT is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraphs "(260)" through "(280)", which are either (i) directed to individuals or entities other than JRT, or (ii) conclusions of law to which no response is required.

JURY DEMAND

JRT demands a trial by jury on all issues so triable.

WHEREFORE, Defendant Jack Russell Touring, Inc. respectfully requests that:

A. the Plaintiffs' First Amended Master Complaint and the additional allegations and claims set forth in the Henault Complaint, as adopted by the Guindon Plaintiffs, be dismissed with prejudice as to it;

B. Plaintiffs' demands for relief against Defendant Jack Russell Touring, Inc. be denied in every respect; and

C. the Court grant such other and further relief as may be just, proper and equitable.

JACK RUSSELL TOURING, INC.

By its Attorneys,

Fred A. Kelly, Jr. (by RLS)

[signature]

Fred A. Kelly, Jr. (#4553)
Randall L. Souza (#4082)
Ian C. Ridlon (#5524)
NIXON PEABODY LLP
One Citizens Plaza
Providence, RI 02903
(401) 454-1000
(401) 454-1030 (Fax)

P120988.1

Edwin F. McPherson (by RJS)

Edwin F. McPherson (Admitted *Pro Hac Vice*)
McPHERSON & KALMANSOHN, LLP
1801 Century Park East, 24th Floor
Los Angeles, CA 90067
(310) 553-8833
(310) 553-9233 (Fax)

Dated: February 4, 2005

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of February, 2005, I served a true copy of the within Answer of Defendant Jack Russell Touring, Inc. to Plaintiffs' Notice of Adoption of First Amended Master Complaint and Pro Forma Complaint via e-mail on all counsel of record listed on the attached service list.

Collette Palmer

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John R. Mahoney, Esq.
ASQUITH & MAHONEY, LLP
155 South Main Street, 2nd Fl.
Providence, RI 02903-7115
johnmahoney@amlawllp.com

Joseph V. Cavanagh, Jr., Esq.
Kristen E. Rodgers, Esq.
BLISH & CAVANAGH LLP
Commerce Center
30 Exchange Terrace
Providence, RI 02903
jvc@blishcavlaw.com

Stephen E. Breggia, Esq.
BREGGIA BOWEN & GRANDE
395 Smith Street
Providence, RI 02908
sbreggia@bbglaw.us

Brian R. Cunha, Esq.
Karen A. Alegria, Esq.
BRIAN CUNHA & ASSOC.
904 Broadway
East Providence, RI 02914
Brian@Briancunha.com

C. Russell Bengtson, Esq.
CARROLL, KELLY & MURPHY
One Turks Head Place
Suite 400
Providence, RI 02903
RBengston@ckmlaw.com

Mark D. Cahill, Esq.
Eric Bradford Hermanson, Esq.
CHOATE, HALL & STEWART
Exchange Place
53 State Street
Boston, MA 02109
mcahill@choate.com

Patrick T. Jones, Esq.
Peter Schneider, Esq.
COOLEY MANION JONES, LLP
21 Custom House Street
Boston, MA 02110
pjones@cmj-law.com

James R. Lee, Esq.
Assistant Attorney General
for the State of Rhode Island
ATTORNEY GENERAL'S OFFICE
150 South Main Street
Providence, RI 02903
jlee@riag.state.ri.us

Ronald J. Resmini, Esq.
Ronald J. Creamer, Esq.
RESMINI LAW OFFICES, LTD.
155 South Main Street, Suite 400
Providence, RI 02903
Resminilaw@yahoo com

Joseph B. Burns, Esq.
ROME, MCGUIGAN & SABANOSH, PC
One State Street
Hartford, CT 06103
jburns@rms-law.com

Steven A. Minicucci, Esq.
William A. Filippo, Esq.
CALVINO LAW ASSOCIATES
373 Elmwood Ave.
Providence, RI 02907
sminicucci@calvino aw.com

Bruce P. Keller, Esq
Jessica L. Margolis, Esq.
DEBEVOISE & PLIMPTON
919 Third Avenue
New York, New York 10022
Bkeller@debevoise.com

Ralph J. Monaco, Esq.
CONWAY & LONDREGAN
38 Huntington Street
P.O. Box 1351
New London, CT 06320
Rmonaco.c-1@snet.net

Christopher C. Fallon, Jr., Esq.
COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19 03
cfallon@cozen.com

Marc DeSisto, Esq.
Kathleen M. Daniels, Esq.
DESISTO LAW
211 Angell Street, P.O. Box 2563
Providence, RI 02906-2563
marc@Desistolaw.com

Stephen M. Prignano, Esq.
Stephen J. MacGillivray, Esq.
EDWARDS & ANGELL, LLP
2800 Financial Plaza
Providence, RI 02903
sprignano@edwardsangell.com

Michael R. DeLuca, Esq.
GIDLEY, SARLI & MARUSAK, LLP
One Turks Head Place
Suite 900
Providence, RI 02903
MRD@gsm-law.com

Eva Marie Mancuso, Esq.
HAMEL, WAXLER, ALLEN & COLLINS
387 Atwells Ave.
Providence, RI 02909
emancuso@hwac.com

Thomas R. Bender, Esq.
James T. Murphy, Esq.
Kelly N. Michels, Esq.
HANSON CURRAN LLP
146 Westminster Street
Providence, RI 02903
trb@hansoncurran.com

Curtis R. Diedrich, Esq.
Edward T. Hinchey, Esq.
James Scanlon, Esq.
SLOANE AND WALSH, LLP
127 Dorrance Street
Providence, RI 02903-2828
Cdiedrich@sloanewalsh.com

Thomas C. Angelone, Esq.
HODOSH, SPINELLA & ANGELONE PC
One Turks Head Place
Suite 1050
Providence, RI 02903
angelonelaw@aol.com

John R. Crockett, III, Esq.
Carl H. Henlein, Esq.
Susan S. Wettle, Esq.
FROST BROWN TODD, LLC
400 West Market Street, 32nd Fl.
Louisville, KY 40202-3363
swettle@fbtlaw.com

Michael A. St. Pierre, Esq.
REVENS REVENS & ST. PIERRE, PC
946 Centerville Road
Warwick, RI 02886
mikesp@rrsplaw.com

Stephanie DiMaio Larivee, Esq.
James Howe, Esq.
GRILLI & DIMAIO
215 Broadway
Providence, RI 02903
singinglawyer@msn.com

Mark T. Nugent, Esq.
Paul Sullivan, Esq.
MORRISON MAHONEY LLP
121 South Main Street, Suite 600
Providence, RI 02903-7141
mnugent@morrisonmahoney.com

Mark C. Hadden, Esq.
LAW OFFICES OF MARK C. HADDEN
68 Kennedy Plaza, Suite 3
Providence, RI 02903
MHadden@mhaddenlaw.com

James A. Ruggieri, Esq.
Gerald C. DeMaria, Esq.
HIGGINS, CAVANAGH & COONEY
123 Dyer Street
Providence, RI 02903
jruggieri@hcc-law.com

Daniel J. Horgan, Esq.
HORGAN LAW OFFICES
5 Shaw's Cove
Suite 200
New London, CT 06320
horganlaw@snet.com

Mark D. Tourgee, Esq.
Timothy A. Williamson, Esq.
INMAN & TOURGEE
1193 Tiogue Avenue
Coventry, RI 02816
inmantourgeelaw@aol.com

John J. Nazzaro, Esq.
JOHN NAZZARO LAW OFFICES
164 Hempstead Street
New London, CT 06320
attynazzaro@aol.com

Charles N. Redihan, Esq.
KIERNAN, PLUNKETT & REDIHAN
91 Friendship Street
Providence, RI 02903
credihan@kprlaw.com

Matthew F. Medeiros, Esq.
LITTLE, MEDEIROS, KINDER, BULMAN &
WHITNEY, P.C.
72 Pine Street, 5th Floor
Providence, RI 02903
mfm@lmkbw.com

Mark S. Mandell, Esq.
Yvette M. Boisclair, Esq.
MANDELL, SCHWARTZ & BOISCLAIR
One Park Row
Providence, RI 02903
msmandell@msn.com

W. Thomas McGough, Jr., Esq.
James J. Restivo, Jr., Esq.
REED SMITH LLP
435 Sixth Avenue
Pittsburgh, PA 15219
tmcgough@reedsmith.com

Anthony F. DeMarco, Esq.
Mark Reynolds, Esq.
REYNOLDS, DEMARCO & BOLAND, LTD.
170 Westminster Street, Suite 200
Providence, RI 02903
tdemarco@conversent.net

Earl H. Walker, Esq.
Charles L. Babcock, Esq.
Nancy W. Hamilton, Esq.
JACKSON WALKER L.L.P.
1401 McKinney, Suite 1900
Houston, TX 77010
CBabcock@jw.com

James H. Reilly, III, Esq.
Donald J. Maroney, Esq.
KELLY, KELLEHER, REILLY & SIMPSON
146 Westminster Street, Suite 500
Providence, RI 02903
dmaroney@kkrs.com

Faith A. LaSalle, Esq.
LAW OFFICES OF FAITH A. LASALLE
One Turks Head Place
76 Westminster Street, Suite 1010
Providence, RI 02903
flasalle@lasallelaw.com

Richard W. MacAdams, Esq.
MACADAMS & WIECK, INC.
101 Dyer Street
Providence, RI 02903
Rmacadams@mandwlaw.com

George E. Wolf, III, Esq.
Ann M. Songer, Esq.
SHOOK, HARDY & BACON, LLP
One Kansas City Place
1200 Main Street
Kansas City, KA 64105-2118
GWolf@shb.com

Andrew J. Trevelise Esq.
REED SMITH LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103-7301
atrevelise@reedsmith.com

Mark P. Dolan, Esq.
Anthony R. Leone, Esq.
RICE DOLAN & KERSHAW
170 Westminster Street, Suite 900
Providence, RI 02903
Ricedolank@aol.com

Edward M. Crane, Esq.
Kimberly A. Simpson, Esq.
Deborah G. Solmor, Esq.
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
333 West Wacker Drive, Suite 2100
Chicago, IL 60606
ecrane@skadden.com

Thomas W. Lyons, III, Esq.
STRAUSS, FACTOR, LAING & LYONS
222 Richmond Street, Suite 208
Providence, RI 02903
tlyons@straussfactor.com

Benjamin V. White, III, Esq.
Howard A. Merten, Esq.
Eric M. Sommers, Esq.
VETTER & WHITE, INCORPORATED
20 Washington Place
Providence, RI 02903
Hmerten.station@vetterandwhite.com

Max H. Wistow, Esq.
John P. Barylick, Esq.
WISTOW & BARYLICK, INC.
61 Weybosset Street
Providence, RI 02903
mw@wistbar.com

Howard J. Julian
570 Shermantown Road
North Kingstown, RI 02874
sohohomes@yahoo.com

J. Renn Olenn, Esq.
OLENN & PENZA
530 Greenwich Ave.
Warwick, RI 02886
jro@olenn-penza.com

Ronald P. Langlois, Esq.
Lauren DiSimone Wilkins, Esq.
SMITH & BRINK, P.C.
One State Street, Suite 400
Providence, RI 02908
Rlanglois@smithbrink.com

Robert I. Reardon, Jr., Esq.
Robert T. Rimmer, Esq.
THE REARDON LAW FIRM, P.C.
160 Hempstead Street
New London, CT 06320
Reardonlaw@aol.com

Scott J. Tucker, Esq.
TUCKER HIEFETZ & SALTZMAN LLP
Three School Street
Boston, MA 02108
STucker@ths-law.com

Donna M. Lamontagne, Esq.
Steven T. Hayes, Esq.
ZIZIK, POWERS, O'CONNELL, SPAULDING & LAMONTAGNE, P.C.
40 Westminster Street, Suite 201
Providence, RI 02903
dlamontagne@zizikpowers.com

Gregory L. Boyer, Esq.
Stephen E. Boyer, Esq.
170 Westminster Street, Suite 200
Providence, RI 02903
Boyerlaw1@aol.com

Joseph J. McGair, Esq.
PETRARCA AND McGAIR, INC.
797 Bald Hill Road
Warwick, RI 02886
jjm@petrarcamcgair.com